

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

VANGUARD ENERGY, LLC

Plaintiff,

Civil Matter No.: 1:21-cv-00117

V.

GLOBAL ENTERPRISE SOLUTIONS,
LLC and XD VENTURES, LLC,

Jury Demanded

Defendants.

**FOURTH STIPULATION AND ORDER TO MODIFY AGREED SCHEDULING ORDER
(DOC. 42) AND PRIOR STIPULATIONS AND ORDER (DOC.44 & DOC. 45)**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff and Counter-Defendant, Vanguard Energy, LLC (“Vanguard”), and Defendants and Counter-Plaintiffs Global Enterprise Solutions, LLC (“GES”) and XD Ventures, LLC (“XD”) (collectively “The Parties”), through their respective counsel of record, jointly submit the following Fourth Stipulation to Modify Agreed Scheduling Order to extend the deadlines pertaining to experts set by the Court as set forth in Agreed Scheduling Order (Doc. 42) and Stipulations and Order to Modify Agreed Scheduling Order (Doc. 44 and Doc. 45) in this case.

This Fourth Stipulation is made pursuant to Federal Rules of Civil Procedure 6(b) and 16(b)(4).

The parties stipulate and agree to a short continuance of Defendant's expert deadlines to allow more time to designate expert witnesses, prepare expert reports and evaluate what further discovery is needed to ready this case for trial. The Parties stipulate to extend the October 2, 2023 expert and report deadline pursuant to FRCP 26(a)(2)(D); Local Rule 9(A)(5) to Monday, October 16, 2023.

STIPULATION

WHEREFORE, IT IS STIPULATED AND AGREED BY AND BETWEEN THE PARTIES, that the following deadlines pertaining to experts are stipulated below.

Deadline	Current Deadline	Stipulated Deadline
Defendant's expert and report deadline: See FRCP 26(a)(2)(D); Local Rule 9(A)(5).	10/02/2023	10/16/2023

IT IS SO STIPULATED.

Dated: October 5, 2023.

Respectfully submitted,

Butch Boyd Law Firm

/s/ Butch Boyd

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***COUNSEL FOR DEFENDANTS AND
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ENTERPRISE SOLUTIONS, LLC AND XD
VENTURES, LLC***

Dated: October 5, 2023.

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*/s/ E. Michael Rodriguez *with permission*

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**ATTORNEYS FOR PLAINTIFF, AND
COUNTER-DEFENDANT VANGUARD
ENERGY LLC**

IT IS SO ORDERED.

Dated: _____

ROLANDO OLVERA

UNITED STATES DISTRICT JUDGE